

not. The management prescriptions do not appear to be specific enough to explain why the allowed use of these trails varies. While we have cited this one example, there are many others, particularly with regard to the various types of non motorized uses such as horses and dog sleds.

### General Comments

The Wilderness Study Area, and its implications to the management of the western Sound, needs to be described. The Forest Plan and the Plan Map should explain interim management intent and the interaction between the WSA and the Forest Plan.

A list of definitions and acronyms must be included in the Forest Plan. The reader is routed to the EIS for this information, but this information is lost amongst all the data in that document.

### Page Specific Comments

#### Proposed Management Plan

Page 2-10, line 327 – This standard(s), which by definition, “must be followed”(p 2-7), sets a minimum altitude restriction for Service permitted or approved aircraft flights. As previously mentioned, only the FAA has jurisdiction over airspace. Thus, we request the Service modify this standard and others that address aircraft over-flights to clarify that altitude minimums are advisory only.

Page 2-11, line 373 – We request that guideline 3, “*Maintain a 2,640-foot (1/2 mile) no disturbance buffer around active trumpeter swan nests . . .*” address potential impacts to DFG's ability to conduct long standing fisheries research projects on Copper River Delta lakes. DFG typically uses floatplanes to access these small lakes, occupying each site for 2 or 3 days each summer using beach seines to sample sockeye salmon. We will, however, make every effort to mitigate potential impacts to nesting swans when routine fisheries surveys require us to encroach beyond the recommended ½ mile buffer.

Page 2-23, line 590 – Guideline 3 states, “*Temporary administrative facilities or camps should be in place no more than two seasons and the site rehabilitated after removal.*” This two-season removal requirement could interfere with DFG management activities that require temporary facilities for more than two seasons to accomplish project objectives. Site locations are often selected based on terrain conditions and logistics, making it impractical to move the temporary facility to a new location. We urge the

Service to consider adopting a definition for temporary facilities consistent with that adopted by the Fish and Wildlife Service:

*The term "temporary" refers to any structure or other human-made improvement which can be readily dismantled and removed from the site when the period of authorized use terminates.*

Page 3-30, line 708 – This sentence states that administrative facilities are not allowed. This is inconsistent with the table on page 3-28, which shows administrative facilities as being allowed consistent with management intent, standards, and guidelines.

DEIS Page xxi, line 52 – ANILCA should be listed under the list of federal legislation applicable to planning for National Forest System lands in Alaska.

DEIS Page 1-1, line 24 – This line should be corrected to refer to the Alaska National (not Native) Interest Lands Conservation Act.

DEIS Page 3-92, line 148 – *Fish Management Indicator Species* - We urge caution in using cutthroats as an indicator species in Chugach National Forest. Because Prince William Sound is the most northern and western extent of the cutthroat range, populations may be more influenced by natural factors than by the effects of "management activities." The small, scattered populations will also be difficult to monitor for changes.

DEIS Page 3-182, lines 4013 – The State requests that "Alaska wildlife agencies" be replaced with Alaska Department of Fish and Game.

DEIS Page 3-439, Line 704 notes that recreation and tourism employment in the region is projected to increase at the same rate in all alternatives over the next ten years. Please cite the data, growth rates, and specific projections used.

DEIS Page 3-442, Line 823 of the draft notes that recreation and tourism is projected to increase at the same rate in all alternatives over the next ten years and that the demand for dispersed recreation over the next ten years will be met in all alternatives, but that demand for developed recreation will not. Again, the FS should cite the specific projections and rate used to calculate changes in the demand for recreation and tourism in general, and specifically for dispersed and developed recreation.

As noted in the previous paragraph, the plan will provide a ten-year supply of opportunities for dispersed recreation. However, since this plan has a 10-15 year planning horizon and it has been at least 16 years since the last plan update, the FS should commit to collaborate with the State in an adaptive management regime which update the plan and reevaluates and amends the supply of opportunities for dispersed recreation to meet continued demand.

DEIS 3-442, Line 225, states that there are four industries that use the forest related resources of the Chugach National Forest: commercial fishing and processing, tourism and recreation, wood products, and minerals. Information presented in Figures 3-83, 3-84, and 3-85 show that regional employment in the visitor industry (5.4-13.4%) greatly exceeds that attributable to wood products (0.1% to 1.8%). Even though the importance of the visitor industry to the local economies greatly exceeds that of wood products, a quantitative analysis of the economic impacts will only be conducted for the wood products industry. It is noted on Page 3-439, Line 714, that an impact and efficiency analysis of the visitor industry will not be conducted because geographical data concerning visitation and expenditures is not available (Page 3-439, Line 714).

The State realizes that there is a deficiency of tourism data in Alaska as a result of the delay in the updating of the Alaska Visitor Statistics program by the Alaska Department of Community and Economic Development. While we are currently in the process of updating that information, it will not be ready until the fall 2001. In the interim, we completed a tourism economic impact analysis in 1998 that, coupled with the data collected from commercial tourism operators through their Special Use Permits (SUP) and Actual Use Reports, should be sufficient to estimate the quantitative economic impacts of changes in forest management practices to the visitor industry. The FS should use the information collected through the SUP and the 1998 study to complete an analysis of the economic impacts to the visitor industry in the region, and commit to adaptive management to incorporate and implement new information in collaboration with the State.

In conclusion, the State of Alaska appreciates the opportunity to submit comments on the Proposed Plan and we look forward to working with the Forest Service to manage all public lands in South Central Alaska in a positive, responsive, and collaborative manner. If you have any questions regarding these comments, please contact Rex Blazer (907) 465-8791 (rex\_blazer@gov.state.ak.us).

issues. The ability of any Alaskan or group of Alaskans to craft and articulate a draft plan alternative was an innovative and welcome approach to the planning process.

The State does not agree with every part of this plan, however. I am enclosing specific comments and recommendations from our State agencies, which we hope will contribute to a stronger and more responsive final plan. The enclosed comments also identify management concerns that will require ongoing attention as the plan is finalized, implemented, and amended over time. Doing so will help manage and resolve issues such as motorized and non-motorized user conflicts, brown bear core habitat protection, and coordination across municipal, state, federal and private land ownership boundaries.

A national treasure, the Chugach offers tremendous opportunities for sustainable development of tourism and recreation opportunities while maintaining the magnificent natural setting which draws so many to visit Prince William Sound. The natural resources of the Chugach also contribute to subsistence activities, jobs and economic vitality at the local community level and throughout southcentral Alaska. Fishing, recreation, transportation, wood products, and mineral resources are important enterprises with a strong connection to multiple use management of the Chugach.

Our shared challenge is to achieve a balance between economic development and diversification, and the protection of the freshwater streams, wildlife, and coastal habitats which are the biological heart of the Chugach. The Copper River delta area is renowned for its world class king and sockeye salmon fisheries, wildlife habitat, and one of the most important migratory bird habitats in North America. The Alaska National Interest Lands Conservation Act (ANILCA) specified that the conservation of fish and wildlife and their habitat should be the primary purpose for management of the area, thereby assuring adequate protection of the Copper River region of the Chugach.

In addition to the Copper River area the mountains and bays and fiords of Prince William Sound, the gateway islands--Hinchinbrook and Montague, and the Kenai Peninsula are all integral parts of the overall Chugach ecosystem. The long-term health of the region's economy and environment depends on protecting the watersheds of the Chugach National Forest and preserving a clean, healthy marine environment in Prince William Sound.

Thank you again for this opportunity for the State of Alaska to comment on the draft Chugach forest plan. Please contact Project Analyst Rex Blazer (907) 465-8791 if we may be of any further assistance as this plan develops.

Sincerely,



Patrick Galvin  
Director

29062

Enclosure

Rick Cables, Regional Forester \

Michele Brown, Commissioner, Department of Environmental Conservation

Deborah Sedwick, Commissioner, Dept of Community and Economic Development

Frank Rue, Commissioner, Department of Fish and Game

Pat Pourchot, Commissioner Department of Natural Resources

John Sisk, Governor Knowles Office

John Katz, Governor Knowles Office, DC

Dec-14-00 07:14pm From-

9072697463

T-188 P.03

# MEMORANDUM

22485  
State of Alaska

CI

Department of Environmental Conservation

TO Rex Blazer  
Project Analyst  
OMB - DGC

200 DEC - PM 3:34

DATE: November 24, 2000

FILE NO:

THRU:

TELEPHONE NO: 465-5364

FROM Kevin J. Hanley <sup>KJH</sup>  
Environmental Specialist  
Division of Air and Water Quality

SUBJECT: Proposed Revised Chugach National  
Forest Land and Resource Management  
Plan & Draft Environmental Impact  
Statement

The Department of Environmental Conservation has reviewed the Proposed Revised Chugach National Forest Land and Resource Management Plan and its accompanying Draft Environmental Impact Statement (DEIS). We would like to commend the Forest Service on the collaborative and consensus-based approach that they used in crafting the broad range of alternatives and in developing the proposed revised plan. Unfortunately, due to budgetary and staffing limitations, the department was unable to fully participate in this planning effort. Despite our lack of participation, we were pleased to see that many of the concerns or recommendations that we may have had appear to have been addressed in the alternatives and in the Management Area Prescriptions, including those for the proposed revised plan. However, we are concerned with the apparent lack of prescriptive riparian standards and guidelines, as well as the ability to maintain the miles of new and existing roads that are proposed under Alternatives A, B, and the No-action alternative. These concerns are discussed as follows:

## 1 Riparian Standards and Guidelines

Given that non-chargeable commercial timber harvesting totaling 1.51 MMBF from 375 acres<sup>1</sup> is allowed under 9 of the 23 Management Area Prescriptions for the Proposed Revised Forest Plan<sup>2</sup>, we were surprised that no prescriptive riparian protection measures were included in either the Forestwide or Management Area Prescription standards and guidelines. In addition to the harvest volume allowed or anticipated under the Preferred Alternative, between 700 MBF and 19.01 MMBF of timber harvesting is allowed or scheduled to occur under the balance of the alternatives.

However, other than Goal 3 under the Forestwide Ecological Sustainability Goals and Objectives<sup>3</sup>, no specific prescriptive riparian standards are provided for protecting the biological function and integrity of aquatic systems on the forest, particularly fish-bearing lakes and Class I, II, and III streams. Specifically, Goal 3 states "*Maintain riparian areas in desired conditions for fish, other aquatic life, and riparian dependent species and to provide for the maintenance of ecosystem processes, including important aquatic and land interactions and high quality water related recreation.*" However, without uniform prescriptive standards, it is difficult to determine how the Forest Service proposes to consistently achieve this goal.

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1. DEIS, Tables 2-7 and 2-8.

2. Proposed Revised Forest Plan (Chapter 3), Management Area Prescription Activities Tables

3. Proposed Revised Forest Plan, page 2-3.

For example, none of the Forestwide standards specifically relate to the protection of riparian areas. The only mitigation pertaining to riparian areas is in the form of a guideline which, according to the Proposed Revised Forest Plan (page 2-7), is an advisable course of action that may be followed to achieve forest goals but is optional. That guideline is Soils Guideline 2.a. which states “*Minimize stream bank disturbance within 25 feet of Class I, II, or III streams.*” Consequently, it appears that no provisions have been made for ensuring that a long-term source of large woody debris, detritus (litter input), and shade is maintained along all estuaries, lakes, and Class I, II, and III streams on and adjacent to the forest.

The only mention of specific riparian protection standards occurs on page 3-30 of the DEIS, which states “*To date, riparian areas on the Forest have not been mapped or specifically defined. Under the State of Alaska’s Forest Practices Act, the Forest provides for riparian protection zones up to 100 feet wide along streams and lakes. These riparian buffers are intended to protect stream water quality (primarily sedimentation) from adverse effects of timber harvest.*” Does this imply that the riparian standards for state lands will be those that will be used on the Chugach? If this is the case, then it should be reflected in the Forestwide standards to ensure that these measures are implemented consistently across those areas of the Forest where timber harvesting is proposed.

In addition to the State Riparian Standards set out in AS 41.17.118(a)(2)(A) & (B), the Slope Stability Standards of the State Forest Practices Regulations (11 AAC 95.280) must apply as well. These include the following:

*11 AAC 95.280(b) – “On all state lands and on all other public lands, the slope stability standards in this section apply to the following area:*

- (1) in Region I [the coastal spruce/hemlock forest], within 100 feet of an ordinary high water mark of an anadromous or high value resident fish water body, or a water body with a gradient of 12 percent or less that is tributary to an anadromous or high value resident fish water body, and within 50 feet of all other tributaries to anadromous and high value resident fish water bodies;*
- (2) in Regions II [boreal forest south of the Alaska Range] and III [boreal forest north of the Alaska Range], within 100 feet of an ordinary high water mark of an anadromous or high value resident fish water body.”*

The specific slope stability standards for these areas include the following:

*11 AAC 95.280(d) – “An operator shall adhere to the following standards when conducting timber harvest activity in an area identified in (a) and (b) of this section:*

- (1) avoid constructing a road that will undercut the toe of a slope that has a high risk of slope failure;*
- (2) within the riparian area of streams not subject to AS 41.17.116(a)(3)(B) or 41.17.116(a)(4)(B) [which apply only to private land within the coastal spruce/hemlock forest], in the operator’s discretion, leave low-value timber where prudent;*
- (3) achieve full or partial suspension in yarding operations;*
- (4) fall timber away from streams in V-notches;*
- (5) avoid sidecasting of displaced soil from road construction to the maximum extent feasible.”*

Taken together, these two sets of standards form the primary protection measures for riparian areas on state lands and all other public lands<sup>4</sup> that are subject to timber harvest activities. However, these standards are much less restrictive than those that were developed for the 1997 Tongass Land Management Plan (TLMP) Revision, which included new protections for Class III non-fish-bearing headwater streams, as well as new channel type process group-specific buffers for Class I and II streams.

The impetus for the increased riparian protection afforded by the TLMP Revision was the 1995 Forest Service Region 10 Anadromous Fish Habitat Assessment (AFHA), a report to the U.S. Congress summarizing the effectiveness of current (pre-TLMP Revision) procedures for protecting fish habitat on the Tongass. The AFHA report (page 7) concluded that *“Current practices on the Tongass do not meet either the goal of the Tongass Land Management Plan to ‘preserve the biological productivity of every fish stream on the Tongass,’ or the long-term goal of avoiding the possible need for listing of salmon and steelhead stocks under the Endangered Species Act.”* One of the chief findings that resulted in this conclusion was that *“Perennial non-fish-bearing streams (Class III streams important for water quality) were not given enough protection to fully control sedimentation and prevent probable long-term degradation of fish habitat in downstream waters in all watersheds examined”* (AFHA, Page 8).

Consequently, even though the historic and projected future levels of timber harvesting on the Chugach are much less than those on the Tongass, the same underlying concern should exist for the protection of Class III streams, especially within the coastal spruce/hemlock forests of Prince William Sound, which has the highest density of such streams on the Forest. In addition, the minimum riparian standards for state lands that the Alaska Forest Practices Act and Regulations require are even less protective than the pre-1997 TLMP Revision standards that were found to be less than adequate in the long-term protection of anadromous fish habitat. Therefore, we would strongly recommend that the Chugach National Forest develop prescriptive riparian standards and guidelines similar to those that were developed for the 1997 TLMP Revision.

## 2. Road Construction and Maintenance

According to the DEIS (page 3-8), *“all alternatives would increase the total miles of open, unpaved roads on the Forest. Unpaved road mile increases over a decade would be the greatest under Alternative B (95 miles), then Alternative A (92 miles), then the No Action Alternative (68 miles). All other alternatives propose between a 10 and 22-mile increase in unpaved roads over a decade.”*

While the relatively small decadal increase in total open roads for Alternatives B, C, D, E, F, and the Preferred Alternative appear to be manageable in terms of maintenance, the substantially large increase in the miles of roads proposed under the No Action Alternative and Alternatives A and B do not. This is particularly true given the uncertainties involved in obtaining maintenance funds over and beyond the ten-year period during which these roads are anticipated to be constructed. According to the Forest Service Roadless Area Conservation Proposed Rule, the ability of the Forest Service to mitigate the detrimental effects of roads (such as impacts to water quality and fish passage) nationwide is limited by an \$8.4 billion maintenance and reconstruction backlog and current

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4. “other public land” means state land managed by state agencies other than the Department of Natural Resources, land owned by a municipality, and land owned by the University of Alaska.



22485

receipts of only about 20 percent of the annual funding needed to maintain the existing road system to current environmental and safety standards. Therefore, unless future funding can be assured to cover the cost of maintenance, a conservative approach should be taken when considering additional miles of road construction on the Forest.

However, this concern may be moot as, according to the DEIS (page 3-312), *"80 percent of the timber roads, 10 percent of the facilities roads, and 100 percent of the other roads would be constructed in roadless areas. Under Alternative F, no road construction would be permitted in the unroaded portion of any inventoried roadless area."* Therefore, given that the Roadless Area Conservation Proposed Rule applies to all inventoried roadless areas on the Chugach National Forest, it would appear that most of these roads could not be built after the Record of Decision is issued in December, and the Roadless Rule is finalized.

Regardless of the final outcome of the Roadless Area Conservation Rule, we highly recommend that the Forest Service not select the No Action Alternative, Alternative A, or Alternative B, since all of these propose the greatest amount of new road construction that would require long-term maintenance. Minimizing the amount of new road construction is especially important as, according to the DEIS (page 3-318), *"few roads are planned for obliteration under any alternative."*

We appreciate the opportunity to comment

cc Chris Foley, ADEC  
Ellen Fritts, ADF&G  
Jim Ferguson, ADF&G  
✓ Dave Gibbons, USFS  
Chris Meade, USEPA

# STATE OF ALASKA

## DEPARTMENT OF FISH AND GAME

TONY KNOWLES, GOVERNOR

State-Federal Issues;  
ANILCA Program  
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April 9, 2001

Mr. Gary Lehnhausen  
Project Team Leader  
Chugach National Forest Planning Team  
U. S. Forest Service  
3301 C Street, Suite 300  
Anchorage, AK 99503

Dear Mr. Lehnhausen:

RE Chugach National Forest Land Management Plan Revision and allowed uses on ANCSA Sec 17(b) easements.

Department staff recently became aware of a significant error in appendix C of the draft plan regarding allowed uses on ANCSA Sec 17(b) public use easements, referenced in the draft plan as "Easement Tr". The Forest Service apparently intends to prohibit motorized uses on certain 17(b) easements on private lands to match the adjacent proposed management prescription on Forest Service lands. For instance, if an easement terminates on Forest Service land that is managed under the backcountry non-motorized prescription, the entire length of the trail, including easement portion on private land, would also be managed as non-motorized.

Easements are a land title issue, not a land management issue. Currently there is no regulatory process by which the Bureau of Land Management or the Forest Service can change allowed uses on a 17(b) easement from those placed in the original conveyance document. Regulations for 17(b) easements in 43 CFR 2650.4-7(d)(4) state "All public easement shall be reserved to the United States and subject, as appropriate, to further Federal, State, or municipal corporation regulations." We are not aware of further regulations establishing federal criteria for changing allowed uses. Furthermore, 2650.4-7(d)(5) states, "All conveyance documents shall contain a general provision which states that pursuant to section 17(b)(2) of the Act, any valid existing right recognized by the Act shall continue to have whatever right of access as is now provided for under existing law."

We urge the planning team to consider this information and reflect appropriate changes in the final plan. Specifically, we request that the private land easement portion of trials referenced in the Access Management Plan mirror those allowed uses placed in the conveyance documents.

Thank you for your assistance in this matter. Please call 267-2248 or e-mail me at [tina\\_cunning@fishgame.state.ak.us](mailto:tina_cunning@fishgame.state.ak.us) if you have questions.

Sincerely,

/ss/

Tina Cunning  
Program Manager

JAN-08-01 MON 15:56

KENAI PENN BORO CLERK

FAX NO. 9072628615

P. 01/03

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**KENAI PENINSULA BOROUGH  
RESOLUTION 2001-005**

**A RESOLUTION OBJECTING TO THE IMPLEMENTATION OF THE PROPOSED  
REVISED LAND AND RESOURCE MANAGEMENT PLAN FOR THE  
CHUGACH NATIONAL FOREST BEFORE A COMPLETE LEGAL REVIEW  
OF THE PLAN CAN BE COMPLETED**

- WHEREAS**, the Draft Environmental Impact Statement and the Proposed Revised Land and Resource Management Plan for the Chugach National Forest were available for public comment until December 14, 2000, and the National Forest Management Act of 1964 regulations require each Forest Plan to be revised every 10 to 15 years; and
- WHEREAS**, the planning area encompasses over 5.45 million acres within the Chugach National Forest, which is the second largest forest in the United States National Forest System and is subdivided into 3 administrative units, the Glacier, Seward and the Cordova Ranger Districts; and
- WHEREAS**, the Seward Ranger District of the Chugach National Forest encompasses a significant portion of the Kenai Peninsula Borough and includes a number of Kenai Peninsula Borough communities such as Hope, Cooper Landing, Moose Pass and Seward; and
- WHEREAS**, the "Situation Statements" of the Proposed Revised Land and Resource Management Plan describes conflicting public interests and existing conditions that could be improved by changing the 1984 Forest Plan, and that one of these conflicts was identified as a conflict between cross-country skiers and cross-country snowmobile operators that would be resolved by closing a number of existing trails or trailheads to snowmobiles because of these major ecological or social conflicts; and
- WHEREAS**, the Forest Service has stated that they have not completed any scientific studies to support closing any of the existing trails or trailheads to snowmobiles because of any major ecological or social conflicts; and
- WHEREAS**, the Proposed Revised Land and Resource Management Plan for the 5.45 million acre Chugach National Forest does not allow for reasonable methods of minerals extraction as access to the minimal amount of acreage made available for minerals exploration within the Forest is severely restricted by the Proposed Revised Land and Management Plan because the Revised Plan does not allow for any new roads to be constructed to provide access to newly surveyed mineral deposits within the Forest; and

**WHEREAS,** the Revised Land and Resource Management Plan for the Chugach National Forest contains only minimal provisions for the mitigation, harvesting and reforestation of a total of 3,343 acres per year out of the hundreds of thousands of acres of forest impacted by the Spruce Bark Beetle infestation within the 5.45 million acre Chugach National Forest; and

**WHEREAS,** the Revised Land and Resource Management Plan for the Chugach National Forest advocates the addition of over 2.5 million acres to restrictive classifications such as Wilderness, Wild Rivers, ANILCA classifications, Backcountry, Scenic Rivers, Brown Bear Core Area, and Recreation-Reduced Noise, all of which may have additional restrictions on numerous user groups and resource development within the Chugach National Forest; and

**WHEREAS,** the Office of General Counsel for the United States Forest Service has indicated to the Forest Service planners that it would take approximately one and a half years to complete a legal review of the Proposed Revised Land and Resource Management Plan for the Chugach National Forest to, in part, conduct a legal determination of the Proposed Plan for consistency with the legal provisions of the Alaska National Interest Lands Conservation Act, or ANILCA; and

**WHEREAS,** the Forest Service has no stated plans to conduct a legal review of the Proposed Revised Land and Resource Management Plan for the Chugach National Forest to provide a legal determination that the Proposed Revised Plan is consistent with the provisions of ANILCA; and

**WHEREAS,** the Kenai Peninsula Borough Assembly has previously expressed its support for continued public access to Chugach National Forest for all recreational users of the Park through Kenai Peninsula Borough Resolution 2000-108; and

**WHEREAS,** the Kenai Peninsula Borough Assembly has previously expressed its support for provisions for expanded timber harvesting and minerals exploration within the Chugach National Forest and has requested a complete legal review of the Proposed Revised Land and Resource Management Plan for the Chugach National Forest through Kenai Peninsula Borough Resolution 2000-112; and

**WHEREAS,** the implementation of the Proposed Land and Resource Management Plan for the Chugach National Forest without a complete and thorough legal review to assure that the Plan is consistent with the provisions of ANILCA could cause serious harm to the economy and quality of life enjoyed now, and in the future, by the citizens of the Kenai Peninsula Borough;

**NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH:**

**SECTION 1.** That the Kenai Peninsula Borough Assembly strongly objects to the implementation of the Proposed Revised Land and Resource Management Plan for the Chugach

National Forest and reserves its support until a complete and thorough legal review of the Proposed Revised Plan can be completed that provides a legal determination stating the Proposed Revised Plan is consistent with the provisions of the Alaska National Interest Lands Conservation Act.

**SECTION 2.** That the Kenai Peninsula Borough Assembly specifically requests a complete and thorough legal review by the Office of General Counsel for the United States Forest Service of the Proposed Revised Land and Resource Management Plan for the Chugach National Forest with the objective to provide a detailed, written legal determination that the Proposed Revised Plan is consistent with the provisions of the Alaska National Interest Lands Conservation Act.

**SECTION 3.** That a copy of this resolution be sent to the members of the Alaska Congressional Delegation, the members of the Kenai Peninsula Borough State Legislative Delegation, the Governor of the State of Alaska, and to the United States Forest Service.

**ADOPTED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH THIS 9TH DAY OF JANUARY 2001.**

ATTEST:

\_\_\_\_\_  
Timothy Navarre, Assembly President

\_\_\_\_\_  
Linda S. Murphy, Borough Clerk

Introduced by: Popp, Merkes  
Dates: 12/12/00  
Action: Adopted  
Vote: 7 Yes, 0 No, 2 Absent

**KENAI PENINSULA BOROUGH  
RESOLUTION 2000-112**

**A RESOLUTION SUPPORTING NEW TIMBER HARVESTING AND MINERALS  
EXTRACTION AS PART OF THE PROPOSED REVISED LAND AND RESOURCE  
MANAGEMENT PLAN FOR THE CHUGACH NATIONAL FOREST**

- WHEREAS,** the Draft Environmental Impact Statement and the Proposed Revised Land and Resource Management Plan for the Chugach National Forest are available for public comment until December 14, 2000, and the National Forest Management Act of 1964 regulations require each Forest Plan to be revised every 10 to 15 years; and
- WHEREAS,** the planning area encompasses over 5.45 million acres in the Chugach National Forest, which is the second largest forest in the National Forest System and is subdivided into 3 administrative units, the Glacier, Seward and the Cordova Ranger Districts; and
- WHEREAS,** the Seward Ranger District of the Chugach National Forest encompasses a significant portion of the Kenai Peninsula Borough and includes a number of Kenai Peninsula Borough communities such as Hope, Cooper Landing, Moose Pass and Seward; and
- WHEREAS,** hundreds of thousands of acres of the Chugach National Forest within the Seward Ranger District have been infested by the Spruce Bark Beetle which has created a substantial fire hazard for the many communities, residences, businesses and citizens of the Kenai Peninsula Borough that reside within the Chugach National Forest; and
- WHEREAS,** the Revised Land and Resource Management Plan for the Chugach National Forest contains only minimal provisions for the mitigation, harvesting and reforestation of a total of 3,343 acres per year out of the hundreds of thousands of acres of trees impacted by the Spruce Bark Beetle infestation within the 5.45 million acre Chugach National Forest; and
- WHEREAS,** the lack of a more comprehensive plan for mitigation, harvesting and reforestation of the hundreds of thousands of acres impacted by the Spruce Bark Beetle will result in the total loss of millions of board feet of potentially valuable trees and place millions of dollars of private property and many citizens of the Kenai Peninsula Borough at risk from catastrophic wildfires within the Chugach National Forest; and

**WHEREAS,** the "Preferred Alternative" proposed by the Forest Supervisor within the Proposed Revised Land and Resource Management Plan for the Chugach National Forest allows for less than 80 acres out of the total 5.45 million acres of the Chugach National Forest to be surveyed for commercial or recreational minerals deposits; and

**WHEREAS,** the Proposed Revised Land and Resource Management Plan for the 5.45 million acre Chugach National Forest does not allow for reasonable methods of minerals extraction as access to any newly discovered mineral deposits within the Forest is severely restricted by the Proposed Revised Land and Management Plan because the Revised Plan does not allow for any new roads to be constructed to provide access to newly surveyed mineral deposits within the Forest; and

**WHEREAS,** the Office of General Council for the United States Forest Service has indicated to the Forest Service planners that it would take approximately one and a half years to complete a legal review of the Proposed Revised Land and Resource Management Plan for the Chugach National Forest to, in part, conduct a legal determination of the Proposed Plan for consistency with the legal provisions of the Alaska National Interest Lands Conservation Act, or ANILCA; and

**WHEREAS,** the Forest Service has no stated plans to conduct a legal review of the Proposed Revised Land and Resource Management Plan for the Chugach National Forest to provide a legal determination that the Proposed Revised Plan is consistent with the provisions of ANILCA; and

**WHEREAS,** the Kenai Peninsula Borough Assembly has previously expressed its support for continued public access to Chugach National Forest for all recreational users of the Park through Kenai Peninsula Borough Resolution 2000-108; and

**WHEREAS,** the Kenai Peninsula Borough Assembly has concerns about the potential impacts that many of the provisions of the Proposed Land and Resource Management Plan for the Chugach National Forest will have on the economy and quality of life enjoyed now, and in the future, by the citizens of Kenai Peninsula Borough;

**NOW, THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH:**

**SECTION 1** The Kenai Peninsula Borough Assembly urges the United States Forest Service to adopt more comprehensive provisions within the Proposed Revised Land and Resource Management Plan for the Chugach National Forest for the mitigation, harvesting and reforestation of the hundreds of thousands of acres impacted by the Spruce Bark Beetle infestation within the Seward Ranger District to prevent the loss of millions of board feet of potentially valuable trees and reduce the possible loss of millions of dollars worth of private property that is at risk from catastrophic wildfires *within the Chugach National Forest Seward Ranger District.*




**SECTION 2.** That the Kenai Peninsula Borough Assembly further urges the United States Forest Service to adopt additional provisions within the Proposed Revised Land and Resource Management Plan for the Chugach National Forest that will provide for new road access to newly discovered and existing mineral deposits that will allow for viable commercial and recreational minerals extraction.

**SECTION 3.** That the Kenai Peninsula Borough Assembly requests that the United States Forest Service perform a legal review of the Proposed Revised Land and Resource Management Plan for the Chugach National Forest to provide a legal determination that the Proposed Revised Plan is consistent with the provisions of the Alaska National Interest Lands Act.

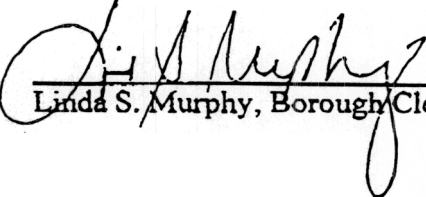
**SECTION 4.** That copies of this resolution be sent to the Alaska Congressional Delegation, the Kenai Peninsula Borough State Legislative Delegation, the Governor of the State of Alaska, and to the United States Forest Service.

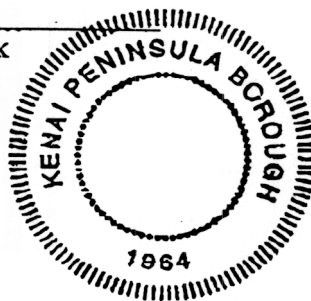
**SECTION 5.** That this resolution shall take effect immediately upon its adoption.

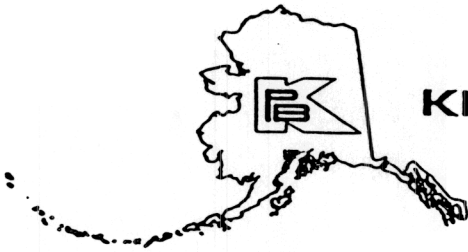
**ADOPTED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH THIS 12TH DAY OF DECEMBER 2000.**

  
Timothy Navarre, Assembly President

ATTEST:

  
Linda S. Murphy, Borough Clerk





## KENAI PENINSULA BOROUGH

144 N. BINKLEY • SOLDOTNA, ALASKA • 99669-7599  
BUSINESS (907) 262-4441 FAX (907) 262-1892

26647

DALE BAGLEY  
MAYOR

December 11, 2000

RECEIVED

DEC 13 2000

CHUGACH NATIONAL FOREST

Attention: Gary Lehnausen  
Chugach Forest Plan Revision  
Chugach National Forest  
3301 C Street, Suite 300  
Anchorage, Alaska 99503-3998

Re: Comments concerning the Proposed Revised Plan

Dear Mr. Lehnausen,

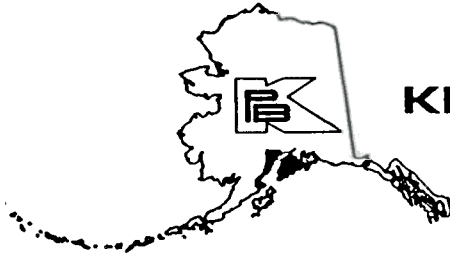
After careful review of the proposed alternatives to the Chugach Plan Revision and listening to the concerns of many citizens of the Kenai Peninsula Borough about the proposed revised plan, I am writing to comment on the proposed revised plan. I am categorically expressing my opposition to the preferred alternative due to its negative impact on the borough. From economic loss to loss of access, the preferred alternative is not in the best interest of the Kenai Peninsula Borough. Snow machine users in particular would be adversely impacted by the limitations proposed under the preferred alternative.

Many people have expressed concerns about why the Chugach Plan is being revised. They don't believe there is a problem and access to the Chugach Forest should remain like it is now. Therefore, the Kenai Peninsula Borough administration is endorsing the NO ACTION Alternative. The No Action Alternative theme of multi-use allows a mix of recreational opportunities, wildlife and fish habitat protection, mineral development, and forest products production. This is the kind of common sense multi-use approach that has worked and will continue to work for the Chugach Forest.

The action the Forest Service takes in selecting an alternative will impact the lives of borough residents for many years to come. With 1,462,474 acres of the Chugach Forest within the Kenai Peninsula Borough, the needs and concerns of our residents should be a major consideration in your process.

Sincerely,

Dale Bagley,  
Borough Mayor



26751

## KENAI PENINSULA BOROUGH

144 N. BINKLEY • SOLDOTNA, ALASKA • 99669-7599  
BUSINESS (907) 262-4441 FAX (907) 262-1892

DALE BAGLEY  
MAYOR

December 4, 2000

Mr. Gary Lehnhausen  
Team Leader  
Chugach National Forest Plan Revision Interdisciplinary Team  
Chugach National Forest Planning Team  
3301 C Street, Suite 300  
Anchorage, Alaska 99503

Dear Mr. Lehnhausen:

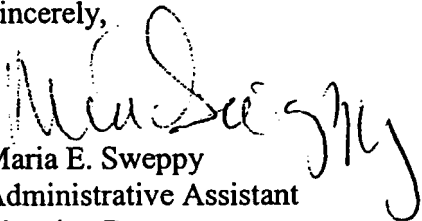
RE: Comments for the Chugach National Forest Plan Revision

The Kenai Peninsula Borough Planning Commission conducted a public hearing for the referenced plan during their regularly scheduled November 27, 2000 meeting. Six people testified during the public hearing.

The Commission voted to postpone this item to their December 11 meeting, which will be held in the Borough Assembly Chambers in Soldotna.

Draft, unapproved minutes of the pertinent portion of the meeting are attached.

Sincerely,

  
Maria E. Sweppy  
Administrative Assistant  
Planning Department

Attachment

200 DEC -7 PM 3:44

01

AGENDA ITEM C.      CONSENT AGENDA

26751

7      Commissioner Excused Absences

- a.      Ellis Hensley
- b.      Jim Skogstad

AGENDA ITEM C.      CONSENT AGENDA

8.      Minutes

- a.      November 13, 2000 Plat Committee Minutes
- b.      November 13, 2000 Planning Commission Minutes

**MOTION:** Vice Chairman Bryson moved, seconded by Commissioner Boscacci, to adopt the consent agenda and approve the regular agenda. Seeing and hearing no discussion or objection, the motion passed by unanimous consent.

AGENDA ITEM D.      PUBLIC COMMENT/PRESENTATIONS/COMMISSIONERS

Chairman Hammelman called for public comment for items not on the agenda. No requests to speak were heard.

Chairman Hammelman read the rules by which public hearings are conducted.

AGENDA ITEM E.      UNFINISHED BUSINESS

- 1      Public Hearing; Chugach National Forest Proposed Revised Land Management Plan; carried forward from October 25, 1999 and November 13, 2000

Verbal staff report by Bob Bright.

PC Meeting: 11-27-00

Mr. Bright noted new information was provided in the packet. The Assembly adopted Resolution 2000-108 (A Resolution Supporting Leaving All Existing Trails in the Chugach National Forest Open for Existing Recreational Uses, Supporting Improvements to and Maintenance of Trails and Parking Lots, and Supporting Building New Cross-Country Ski Trails) during their November 21 meeting. This resolution opposes closing the recreational trails in the Chugach plan.

END OF VERBAL STAFF REPORT

Chairman Hammelman opened the public hearing for comment.

- 1      Dennis Merkes

Mr. Merkes appreciated the Commission opening their meeting for public comment. He distributed a flyer describing the Kenai Peninsula Public Land Users Group (KPPLUG). He was speaking for KPPLUG, which represented all users of public land. He apologized for not being present during the previous public hearing. He was unfamiliar with the status of the Commission's actions.

KPPLUG wanted to gather all users of public land as well as the various federal, state, and local agencies together to find compromises and solutions that will work for all users. KPPLUG is tired of losing their right to recreate in the backcountry in the Kenai Peninsula as well as the State.

Through adoption of Resolution 2000-108 the Assembly agreed with the group regarding loss of access, especially into the backcountry. KPPLUG is looking into how to gain better access and better control of existing trails so they are easier to use for the various groups. Mr. Merkes said numerous meetings have